



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
401 CHURCH STREET
L & C ANNEX 6TH FLOOR
NASHVILLE TN 37243**

January 8, 2013

Ms. Robin Hagerty, P.E., CPESC
AMEC Earth & Environmental, Inc.
e-copy: robin.hagerty@amec.com
3800 Ezell Road, Suite 100
Nashville, TN 37211

Subject: **NPDES Permit No. TN0081108
Memphis Regional Intermodal Facility
Rossville, Fayette County, Tennessee**

Dear Ms. Hagerty:

The Division of Water Resources (division) has received your letter dated December 6, 2012, regarding Acrylamide Monomer Sampling Requirements. In consideration of your request to eliminate the acrylamide monomer monitoring requirement from your NPDES permit (TN0081108), the division has determined that more information is needed in order to make a decision.

During the permit application and permit drafting processes, Norfolk Southern Railway Company (NSR) submitted information regarding the specific planned uses of polymers and the specific types of polymers that were going to be used at the site. However, the division realizes that during the course of construction changes in construction plans or site characteristics could have necessitated a change in the polymers used to treat stormwater effluent from the sediment basins. Therefore, the division requests that NSR submit information on the polymers that you plan to use and that have previously been used to treat stormwater from the sediment basins above outfalls SW9, SW10, SW29, SW30, SW31, SW32 and SW37. In addition to information on which polymers were used, the time periods in which they were used, and in which sediment basins they were used, NSR should also submit copies of the MSDS sheets for those polymers.

Finally, the division noted on the analytical reports that the MDL (method detection limit) for acrylamide was 8.0 ug/L and that the RL (reporting limit) was 100 ug/L. The division noted that all reports seem to show a test result of <100 ug/L. The division is unclear as to why the result shows "<100" rather than reporting an actual number between the MDL and RL. Please provide an explanation for this to clarify what the lab reports mean by reporting limit.

If you have questions, please contact the Memphis Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Ms. Erin O'Brien at (615) 253-2245 or by E-mail at *Erin.O'Brien@tn.gov*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Vojin Janjić", is located below the "Sincerely," text.

Vojin Janjić
Manager, Permit Section

cc: Permit Section File
Memphis Environmental Field Office (Joellyn.Brazile@tn.gov)
Mr. Tim Drake, Vice President - Engineering, Norfolk Southern Railway Company, tim.drake@nscorp.com
Mr. Tony Caruso, Construction Project Supervisor, Norfolk Southern Railway Company, anthony.caruso@nscorp.com
Mr. Phillip Hilliard, Senior Counsel, TAG Environmental Division, Phillip.Hilliard@ag.tn.gov